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**FILED**

2/8/2021

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THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

STANLEY NEWSOME

Case No. **1:21-cr-00097**

Violation: Title 21, United States Code,  
Section 841(a)

**Judge Thomas M. Durkin  
Magistrate Judge Sunil R. Harjani**

The SPECIAL NOVEMBER 2020 GRAND JURY charges:

On or about August 30, 2020, at Chicago, in the Northern District of Illinois,  
Eastern Division, and elsewhere,

STANLEY NEWSOME,

defendant herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely a quantity of 3-4 Methyleneioxymethamphetamine ("MDMA"), a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

**FORFEITURE ALLEGATION**

The SPECIAL NOVEMBER 2020 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 21, United States Code, Sections 841, 843, and 846, as set forth in this Indictment, defendant shall forfeit to the United States of America any property which constitutes and is derived from proceeds obtained, directly and indirectly, as a result of the offense; and any property used, and intended to be used, in any manner and part, to commit and facilitate commission of the offense, as provided in Title 21, United States Code, Section 853(a).
2. The property to be forfeited includes, but is not limited to a Fabryka Broni model P64, 9x19 caliber pistol bearing serial number WG10805 and associated ammunition.
3. If any of the property described above, as a result of any act or omission by a defendant cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the

United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code, Section 853(p).

A TRUE BILL:

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FOREPERSON

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Signed by Timothy J. Storino on behalf of the  
UNITED STATES ATTORNEY